

**Qwest.**

*Spirit of Service*

**Qwest**  
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**Melissa E. Newman**  
Vice President – Federal Regulatory

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**MAR 25 2004**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**REDACTED  
FOR PUBLIC INSPECTION**

March 25, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *In the Matter of Section 272 (f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, WC Docket No. 02-112; 2000 Biennial Regulatory Review Separate Affiliate Requirements of Section 64.1903 of the Commission's Rules, CC Docket No. 00-175*

Dear Ms. Dortch:

On January 29, 2004, Qwest submitted certain information in the above-captioned proceedings in response to an earlier Commission staff request. Subsequently, Commission staff requested that Qwest supplement the information that it provided on January 29, 2004. Qwest's response to the Commission staff's most recent request is attached. Portions of the attachment are being redacted and designated as Confidential – Not for Public Disclosure. Pursuant to Sections 0.457(d) and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457(d) and 0.459, Qwest requests that the redacted information in the attachment be withheld from public inspection. The redacted portions of the attachments contain Qwest's confidential information. Disclosure may cause substantial competitive harm to Qwest. Accordingly, the redacted information is appropriate for non-disclosure either under Sections 0.457(d) or 0.459 of the Commission's rules. It should be noted that all attached exhibits that Commission staff requested from Washington Utilities and Transportation Commission Docket No UT-030614, Order No 17, *Order Granting Competitive Classification*, also had been redacted since this information was subject to a Washington Utilities and Transportation Commission protective order and was not available for public inspection.

In accordance with Commission rules, Qwest is submitting (under separate cover) the non-redacted confidential version of the aforementioned attachments. Acknowledgment and date of receipt of this submission are requested. An original, one copy and a duplicate copy of this request are provided. Please date-stamp the duplicate upon receipt and return it to the

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Ms. Marlene H. Dortch  
March 25, 2004

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courier. If you have any questions regarding this filing, please contact the undersigned at the contact information reflected in the letterhead.

Sincerely,

/s/ Melissa E. Newman

cc: Renee Crittendon ([renee.crittendon@fcc.gov](mailto:renee.crittendon@fcc.gov))  
Brent Olson ([brent.olson@fcc.gov](mailto:brent.olson@fcc.gov))  
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Jon Minkoff ([jon.minkoff@fcc.gov](mailto:jon.minkoff@fcc.gov))

Attachments

**FCC DATA REQUEST**  
**Sunset Proceeding (WC 02-112)**  
**Qwest Responses**

1. Provide the total number of customers that have chosen the BOC affiliate as their interLATA PIC by month, by state, for the period 1/03-12/03.

*Response: InterLATA PIC see Attachment 1; Local and Long Distance packages see Attachment 2*

2. Provide the number of BOC customers choosing broadband/xDSL service by month, by state, for the period 1/03-12/03.

*Response: See Attachment 3*

3. Provide the number of UNE Platforms and UNE loops sold by month, by state, for the period 1/30-12/03.

*Response: UNE Platforms see Attachment 4; UNE Loops see Attachment 5*

4. For the enterprise market, provide some description of what the market looked like before Qwest received 271 relief and after 271 was granted.

*Response:*

***Enterprise Market Definitions***

- ***Qwest:*** Qwest defines the Enterprise market based on three common criteria: number of employees, number of locations, and amount spent. For the Enterprise market the customer (account) will have more than 500 employees, have multiple locations both in and outside of Qwest's 14-state region, and currently spend or have the opportunity to spend over \$10,000 monthly. Because of the size and locations of these accounts it is rare that they would have just one communications provider. Typically these customers purchase a wide variety of products and services from several providers to ensure redundancy and diversity.
- ***Industry Definition:*** large business, also known as an "enterprise," a large business is a company with 500 or more employees. (Source: IDC, Worldwide Conferencing Services Market Forecast and Analysis, 2000-2005, pg. 12)

*Prior to 271 relief Qwest was limited in its ability to market and sell services to the enterprise market. While Qwest had a large presence out-of-region, it was hampered in working with the nationwide enterprise customers. Instead of looking at the customer's service request and trying to find the best solution, Qwest would look at the customer's request, apply the regulatory 271 filter, and then try and sell services. For example, if an enterprise customer had offices in Atlanta, New York, Denver and Seattle. Qwest could have provided service between Atlanta and New York, and Denver and Seattle. However, Qwest was significantly limited in its ability to carry traffic between Atlanta (out-of-region) and Denver (in-region). This resulted in Qwest only being able to offer enterprise services to approximately 40% of the total enterprise market.*

*Post 271 relief Qwest is able to offer enterprise customers a more complete set of services including nationwide voice, data and internet solutions.*

5. Provide the following attachments included in the Washington competitive classification order: Qwest Exhibits 51T, 53C, 54C, 55C  
Washington Commission Exhibits 201T, 204C, 205C, 210C, 225C, 232C

*Response: The Qwest Exhibits are confidential and are redacted in this Public Version of the Response.*

*The Washington Commission Exhibits were not provided to Qwest. To discuss the Exhibits contact Tom Wilson, Telecommunications Analyst, Washington Utilities and Transportation Commission, at 360-664-1282.*

ATTACHMENT 1

**Qwest LD Corp (QLDC)**  
**InterLATA Presubscribed Lines\* by State - 2003**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
AZ												
CO												
IA												
ID												
MN												
MT												
ND												
NE												
NM												
OR												
SD												
UT												
WA												
WY												
Total												

\* Data is as of the end of each month for residential customers

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ATTACHMENT 2

**Qwest LD Corp. (QLDC)**  
**Subscribers\* Purchasing Local and Long Distance Packages by State - 2003**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
AZ												
CO												
IA												
ID												
MN												
MT												
ND												
NE												
NM												
OR												
SD												
UT												
WA												
WY												
Total												

\* Residential customers.

**REDACTED – FOR PUBLIC DISCLOSURE**

ATTACHMENT 3

**Qwest Corporation (QC)**  
**DSL Subscribers\* by State - 2003**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
AZ												
CO												
IA												
ID												
MN												
MT												
ND												
NE												
NM												
OR												
SD												
UT												
WA												
WY												
Total												

\* Retail and wholesale customers.

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**Qwest Corporation (QC)**  
**Total Monthly UNE Platforms in Service by State\* - 2003**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
AZ												
CO												
IA												
ID												
MN												
MT												
ND												
NE												
NM												
OR												
SD												
UT												
WA												
WY												
Total												

\* Purchased by CLECs

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Qwest Corporation (QC)  
Total Monthly UNE Loops in Service by State\* - 2003

AZ	CO	IA	ID	MN	MT	ND	NE	NM	OR	SD	UT	WA	WY	Total
Jan														
Feb														
Mar														
Apr														
May														
Jun														
Jul														
Aug														
Sep														
Oct														
Nov														
Dec														

\* Purchased by CLECs.

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